

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:
*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**SUMMIT COUNTY AND CITY OF AKRON, OHIO PLAINTIFF'S
SUPPLEMENTAL RESPONSES AND OBJECTIONS
TO DISTRIBUTOR DEFENDANTS'
INTERROGATORY NUMBERS 10, 11, AND 12**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Case Management Order in *In re National Prescription Opiate Litigation*, No. 1:17-cv-2804 (Dkt. No. 232), the County of Summit, Ohio and the City of Akron, Ohio (collectively "Plaintiff") hereby responds to Distributor Defendants'¹ Interrogatory Nos. 10, 11, and 12 (the "Interrogatories" and, each individually, an "Interrogatory"), as follows:

OBJECTIONS

The following objections apply to each Interrogatory. To the extent that certain specific objections are cited in response to an individual Interrogatory, those specific objections are provided because they are applicable to that specific Interrogatory and are not a waiver of the other objections applicable to information falling within the scope of such Interrogatory.

1. Plaintiff objects to each Interrogatory to the extent they are overly broad, vague, unduly burdensome, seek information that is not relevant to any party's claim or defense, or seek

¹ The Distributor Defendants are AmerisourceBergen Drug Corporation, Cardinal Health, Inc., and McKesson Corporation (collectively "Distributors").

to impose obligations or require actions beyond those required by the Rules of Civil Procedure, the ESI Protocol entered in this matter or the Local Rules of the United States District Court of the Northern District of Ohio.

2. Plaintiff objects to each Interrogatory to the extent they seek information restricted from dissemination pursuant to court order, statute, or regulation. Further, any response made by Plaintiff to the Interrogatories is not intended to waive, and does not constitute any waiver of, any objection to the admissibility, authenticity, competency or relevance of the information produced or identified.

3. These responses are made solely for the purpose of and in relation to this action. Each answer is given subject to all appropriate objections, which would require the exclusion at trial of any statement contained or document provided herein. All such objections and the grounds therefore are hereby reserved.

4. No admission of any nature whatsoever is to be implied or inferred in these responses. The fact that any of the Interrogatories herein may have been answered should not be taken as an admission or a concession of the existence of any facts set forth or assumed by the Interrogatories, or that such answer constitutes evidence of any fact thus set forth or assumed.

5. Plaintiff objects to each Interrogatory to the extent Plaintiff has not yet completed its investigation of the facts relating to this action and has not yet completed its preparation for trial. Accordingly, these responses are necessarily limited in nature, and reflect only that information known to Plaintiff at this time.

6. Plaintiff objects to each Interrogatory to the extent they purport to require Plaintiff to produce documents that are in the public domain or otherwise available to Distributors as easily from other sources as from Plaintiff.

7. Plaintiff objects to each Interrogatory to the extent they purport to state facts, assumptions, or characterizations that are disputed.

8. Plaintiff objects to each Interrogatory to the extent they seek information more appropriately obtained through other methods of discovery.

9. Plaintiff objects to each Interrogatory to the extent that they seek information that is proprietary or confidential or that is protected from discovery as attorney work product and attorney-client communication, information gathered or prepared in anticipation of litigation, the public interest privilege, law enforcement privilege, public official privilege, and/or by any other privilege or immunity from disclosure (collectively, “Privileged Information”).

10. Plaintiff objects to each Interrogatory to the extent they seek confidential investigative, personal, or health information in Plaintiff’s possession, custody, or control (collectively, “Confidential Information”).

11. Whenever in the responses Plaintiff employs the phrase “subject to and without waiving all objections,” Plaintiff is responding to the Interrogatory as it may be narrowed by its general and specific objections and without waiver of any objection.

12. Any response stating that Plaintiff will produce documents shall be deemed followed by the phrase “as are within Plaintiff’s possession, custody, or control.”

13. Plaintiff objects to each Interrogatory to the extent that they imply the existence of facts or circumstances that do not or did not exist, and to the extent that it states or assumes legal conclusions. In providing these objections and responses, Plaintiff does not admit the factual or legal premise of any Interrogatory.

14. Plaintiff objects to each Interrogatory to the extent they seek information that is not within Plaintiff’s possession, custody, or control, seek documents that do not already exist, or

which purport to require a response by Plaintiff on behalf of an entity or individual other than Plaintiff.

15. Plaintiff reserves the right to supplement, revise, correct, or clarify its responses and objections in the event that additional information becomes available.

16. Plaintiff intends to complete its responses by the time agreed upon by the parties for the completion of discovery, or by the date ordered by the Court. Upon request by the requesting party, Plaintiff is willing to meet and confer regarding its responses to the Interrogatories. All final decisions regarding whether any information will be withheld pursuant to any objection shall be made, and notice thereof provided, before the completion of written discovery.

17. Plaintiff objects to the Distributors' instruction that: "Each Plaintiff must individually respond to each of these Interrogatories." No federal rule prevents Plaintiff from submitting collective answers to Distributors' collective Interrogatories. Where the responses and objections to these Interrogatories are the same for each Plaintiff, a collective response herein will in no way prejudice Defendants. In each instance where the answers are not the same for each Plaintiff, any differences have been set forth herein with particularity.

NON-WAIVER

1. Plaintiff's responses are made without waiving its right to object (on the grounds of relevancy, hearsay, materiality, competency or any other ground) to the use of its responses in any subsequent stage or proceeding in this action or any other action.

2. If Plaintiff, in response to any Interrogatory, inadvertently discloses information that is or could be the subject of the objections stated herein, such disclosure is not intended to be, nor is it deemed to be, a waiver of the objections with respect to such information disclosed.

3. Plaintiff's failure to object to a specific Interrogatory on a particular ground or grounds shall not be construed as a waiver of its rights to object on any additional grounds.

4. Plaintiff responds herein based upon information it has been reasonably able to gather at the time of making these responses. Plaintiff reserves its right to amend and/or to supplement its objections and responses to the Interrogatories, consistent with further investigation and discovery.

SPECIFIC RESPONSES AND OBJECTIONS

Interrogatory No. 10:

Identify each instance for each year of the Timeframe in which You notified a state or federal official or agency (including but not limited to the United States Drug Enforcement Agency, a United States Attorney or representative thereof, Ohio Department of Medicaid and its constituent providers, Ohio Department of Public Safety, Ohio Automated Rx Reporting System, State of Ohio Board of Pharmacy, and State Medical Board of Ohio), insurer, third party payer, or pharmacy benefit manager of suspected diversion, improper or excessive dispensing, improper prescribing, unlawful sale, or other suspected wrongdoing related to Prescription Opioids.

Response to Interrogatory No. 10:

See response to Interrogatory No. 1 from Summit County and City of Akron, Ohio Plaintiff's First Amended Responses and Objections to Distributor Defendants' First Set of Interrogatories served on June 20, 2018. Plaintiff objects that this Interrogatory is overly broad and unduly burdensome and seeks information beyond Plaintiff's possession, custody, and control. Further objecting, the Interrogatory contains a reference to several undefined terms and phrases, namely, "excessive dispensing" and "improper prescribing." Plaintiff objects to this Interrogatory because certain responsive information is subject to the law enforcement privilege or privacy rights.

Subject to and without waiving all objections, Plaintiff answers as follows: Plaintiff refers Defendants to <https://www.ohiopmp.gov/Reports.aspx> for available OARRS data. Plaintiff further directs Defendants to the following documents:

SUMMIT_000016827-828

SUMMIT_000061764-766

SUMMIT_000019855

SUMMIT_000019856

SUMMIT_000019857

SUMMIT_000019858

SUMMIT_000019859

SUMMIT_000019867

SUMMIT_000019876

SUMMIT_000019942

SUMMIT_000020013

SUMMIT_000020014

SUMMIT_000020015

SUMMIT_000020023

SUMMIT_000020033

SUMMIT_000020067

SUMMIT_000020105

SUMMIT_000020138

SUMMIT_000020175

SUMMIT_000020184

SUMMIT_000020195

SUMMIT_000020221

SUMMIT_000020247

SUMMIT_000020276

SUMMIT_000020305

SUMMIT_000020314

SUMMIT_000020324

SUMMIT_000020349

SUMMIT_000020380

SUMMIT_000020406

SUMMIT_000020429

AKRON_000253758-759

AKRON_001142143

Interrogatory No. 11:

Identify each investigation, arrest, or prosecution within Your geographical boundaries for each year of the Timeframe that involved (a) a Prescription Opioid or (b) other opioids. Include as part of your response any information or evidence that connects each investigation, arrest, or prosecution to a Prescription Opioid distributed by Distributor Defendants.

Response to Interrogatory No. 11:

Plaintiff objects that this Interrogatory is overly broad and unduly burdensome and seeks information beyond Plaintiff's possession, custody, and control. Subject to and without waiving all objections, Plaintiff will conduct a reasonable and diligent search for and, if such information is in Plaintiff's possession, custody, or control, will supplement this answer with non-privileged information responsive to this Interrogatory once the information is available to the Plaintiff.

Plaintiff responds and incorporates the answer to Interrogatory No. 8 from Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Numbers 2, 3, 48, 12, 14, 15, 16, 16, 23, 24, 27 & 29 served on March

4, 2019. Plaintiff also refers Defendants to court and prosecutor files produced in this litigation, as well as expert reports, as responsive to this request pursuant to Federal Rule of Civil Procedure 33(d). Plaintiff further directs Defendants to the following documents:

AKRON_000209521

AKRON_000211711

AKRON_000219613

AKRON_000280843

AKRON_000289844

AKRON_000368351

AKRON_000370632

AKRON_000374983

AKRON_000367619

AKRON_001142108

AKRON_001142127

AKRON_001126216

AKRON_000368752

AKRON_001312644

AKRON_000369261

AKRON_000369262

AKRON_000369711

AKRON_000370632

AKRON_000368693

AKRON_000368700

SUMMIT_000019867

SUMMIT_000020221

SUMMIT_001132122

SUMMIT_001133688-693

SUMMIT_000366435

SUMMIT_000383255-272

SUMMIT_000416730-738

SUMMIT_000592654

SUMMIT_000668052

SUMMIT_000120920

SUMMIT_001001568

SUMMIT_001002116

SUMMIT_001002210

SUMMIT_001002216

SUMMIT_000076823

SUMMIT_000077148

SUMMIT_000077175

SUMMIT_000077336

SUMMIT_001422973

Interrogatory No. 12:

Identify every Person likely to have discoverable information related to Your claims, including, but not limited to, every Person upon whom You intend to rely in proving Your claims on summary judgment or at trial, and every Person likely to have discoverable information that supports or contradicts a position or claim that You have taken or intend to take in this action. For

every Person named in response to this Interrogatory, state the subject matter of the information possessed by that Person.

Response to Interrogatory No. 12:

Plaintiff incorporates all prior objections to this interrogatory. Subject to and without waiving all objections, Plaintiff provides the following persons likely to have discoverable information:

Name	Title	Subject Matter
Donna Skoda	Health Commissioner	Public Health
Rich Marountas	Chief Epidemiologist	Public Health
Jackie Pollard	Assistant Community Health Director	Public Health
Leanne Beavers	Director Clinical Health	Public Health
Angela Burgess	Fiscal Officer Public Health	Public Health/Finances
Dr. Doug Smith	Doctor, ADM Chief Clinical Officer, ADM	ADM
Jerry Craig	Executive Director, ADM	ADM
Kim Patton	ADM	ADM
Jen Peveich	ADM	ADM
Aimee Wade	ADM Assoc. Dir. of Clinical Services	ADM
Dr. Lisa Kohler	Chief Medical Examiner, Summit County	Medical Examiner
Dr. George Sterbenz	Chief Deputy Medical Examiner	Medical Examiner
Steve Perch	Chief Toxicologist, Medical Examiner's Office	Medical Examiner; Toxicology
Gary Guenther	Chief Investigator, Summit County Medical Examiner's Office	Medical Examiner
Todd Barr	Deputy Medical Examiner	Medical Examiner
Denice DiNapoli	Senior Administrator, Medical Examiner's Office	Medical Examiner
Justin Benner	Forensic Investigator	Medical Examiner
Clarence Dorsey	Forensic Investigator	Medical Examiner
Lauren Fowler	Forensic Investigator	Medical Examiner
Jasmine Griffin	Forensic Investigator	Medical Examiner
Jason Grom	Forensic Investigator	Medical Examiner
Jenna Kolb	Forensic Investigator	Medical Examiner
Amy Schaefer	Supervisor, Forensic Investigators	Medical Examiner
Kelsie Stopak	Forensic Investigator	Medical Examiner
Robert Velten	Forensic Investigator	Medical Examiner
Michael McGill	Forensic Investigator	Medical Examiner
Darin Kearns	Deputy Executive Director of Finance and CFO, Summit County Children Services	Children Services

Name	Title	Subject Matter
Julie Barnes	Executive Director, Summit County Children Services	Children Services
Amy Davidson	Deputy Executive Director of Social Services	Children Services
Tracey Mayfield	Department Director of Social Services Programs	Children Services
Sushila Moore	Director of Intake, Children Services	Children Services
Lori Baker-Stella	Deputy, DEA Drug Liaison Officer	Sheriff's Office
Bill Holland	Public Information Office, and Jail Commander, Sheriff's Office	Sheriff's Office
Scott Cottle	Lieutenant, Sheriff Detective Bureau	Sheriff's Office
Stacy Milkey	Administrative Assistant, Sheriff	Sheriff's Office
Carmen Ingram	Deputy, Sheriff Drug Unit	Sheriff's Office
Mike Walsh	Sergeant, Sheriff's Office	Sheriff's Office
Matt Paolino	Captain , Sheriff's Office	Law Enforcement
Brad Gessner	Criminal Division, Summit County's Prosecutor's Office	Courts
Getta Kutuchief	Education and Community Outreach Coordinator, Juvenile Court	Courts
Lisa DiSabato-Moore	Special Projects Administrator, Juvenile Court	Courts
Becky Ryba	Coordinator Family Reunification through Recovery Court, Juvenile Court	Courts
Kathryn VanHorn	Crossroads Supervisor, Juvenile Court	Courts
Howard Curtis	Chief Probation Officer, Juvenile Court	Courts
Joseph McAleese	Assistant Prosecutor	Courts
Jon Baumoeel	Assistant Prosecutor	Courts
Brian Nelsen	Director of Finance and Budget	Executive/Finances
Greta Johnson	Asst. Chief of Staff for the Summit County Executive	Executive
Lori Pesci	Deputy Director, Division of Public Safety	Executive
Chief Clarence Tucker	Chief of Fire Division	Fire/EMS
Deputy Chief Charles Twigg	Deputy Chief of Fire Division	Fire/EMS
District Chief Joseph Natko	District Chief / EMS Bureau Manager	Fire/EMS
Robert Ross	Formerly Deputy Mayor for Public Safety, Fire Chief	Fire/EMS
Cpt. Leon Henderson	Captain, Safety Communications	Fire/EMS
Cpt. Chris Karakis	Captain, EMS Bureau Manager	Fire/EMS
District Chief Jim Willoughby	District Chief, formerly Captain, EMS Bureau Manager	Fire/EMS
Lt. Joseph Shumaker	Lieutenant, Fire/EMS	Fire/EMS

Name	Title	Subject Matter
Guy Randall	Fire/EMS medic, training	Fire/EMS
Dale Evans	Formerly Deputy Chief, EMS Bureau Manager	Fire/EMS
Gaiser, Les	Formerly Captain	Fire/EMS
Ed Hiltbrand	Chief of Fire Division	Fire/EMS
Albert Minnich	Fire/EMS Medic	Fire/EMS
Rich Vober	Deputy Chief	Fire/EMS
Patrick Leonard	Police, Narcotics / Diversion Unit	Law Enforcement
Chief Kenneth Ball	Police Chief, formerly Deputy Chief, Investigative Subdivision	Law Enforcement
Officer Michael Schmidt	Officer, Narcotics Unit, opioid heroin overdose death investigator	Law Enforcement
Cpt. Michael Shearer	Captain, Narcotics, SNUDS, Vice Subdivision	Law Enforcement
Deputy Chief Michael Caprez	Deputy Chief, Uniform Subdivision, formerly Deputy Chief, Communications Subdivision	Law Enforcement
Deputy Chief Jesse Leaser	Deputy Chief, Investigative Subdivision, formerly Captain, Technical Services Bureau	Law Enforcement
Lt. Rick Edwards	Police Information Officer	Law Enforcement
Charles Brown	Deputy Mayor for Public Safety, Assistant to the Mayor	Public Safety
Gert Wilms	Chief Prosecutor	Courts
Montrella Jackson	Court Administrator, Akron Municipal Court	Courts
Craig Morgan	Deputy Prosecutor	Courts
Jeff Sturmi	Deputy Chief Probation Officer	Courts
Tony Ingram	Chief Probation Officer	Probation
Teresa Albanese	Assistant to the Mayor for Education, Health, and Families	Executive
Craig Gilbride	Formerly Deputy Mayor for Public Safety, Chief of Police	Executive
Lt. Sierjie Lash	Public Information Officer	Executive
Diane Miller-Dawson	Finance Director	Finance
Steve Fricker	Deputy Director of Finance	Finance

Name	Title	General description
Dr. William Reed	Doctor	Visited by drug reps: Nucynta, Purdue, Actiq, Opana, Kadian
Dr. William Lonsdorf	Doctor	Visited by Purdue, Opana, Nucynta,
Dr. Kendrick Bashor	Doctor	Visited by drug reps: Purdue
Dr. Michael Louwers	Doctor	Visited by drug reps: Purdue, Xtampza, Nucynta, Actiq/Fentora

Name	Title	General description
Dr. Syed Ali	Doctor	Visited by drug reps: Purdue, Xtampza, Nucynta-Janssen/Depomed, Teva, Subsys, Endo, Cephalon, Xalgo, Kadian, Insys
Dr. Clayton Seiple	Doctor	Visited by drug reps: Purdue. Was a speaker for Endo, Depomed (Nucynta)
Bernie Rochford	Executive Vice President of Administrative Services and Business Relations, Oriana House	Treatment center for those suffering from OUD, knowledgeable on trends, prevalence and impact of opioids
Galen Sievert	Clinical Supervisor, Mature Services	Treatment center for those suffering from OUD, knowledgeable on trends, prevalence and impact of opioids
Laura Kidd	Behavioral Health Clinical Coordinator, AxessPointe Community Health Center at Arlington	Treatment center for those suffering from OUD, knowledgeable on trends, prevalence and impact of opioids
James Orlando	President of Summit Psychological Associates	Treatment center for those suffering from OUD, knowledgeable on trends, prevalence and impact of opioids
Brittney Becker	Doctor, Community Health Center	Treatment center for those suffering from OUD, knowledgeable on trends, prevalence and impact of opioids
Michael M. Hughes	President, Summa Health System, Barberton Campus	Illnesses related to opioid use
Joseph P. Myers	Doctor, Vice President of Medical Affairs, Summa Barberton and Summa Wadsworth-Rittman Hospitals	Illnesses related to opioid use
Roslyn Greene	Family member	Personal loss
Charlene Maxen	Pediatric oncologist nurse, Akron Children's Hospital	Personal loss
Travis and Shelly Bornstein	Family member	Personal loss
Dr. Tony Lababidi	Doctor	Visited by drug reps: Purdue, Endo, Janssen
Dr. Laura Novak	Doctor	Visited by drug reps: Purdue
Dr. Adolph Harper	Doctor	Visited by drug reps
Reba McCray	Family member	Personal loss
Josh Vandergriff	Family member	Personal loss

Name	Title	General description
Dr. Ann DiFrangia	Specializes in treatment of substance use disorders	Addiction
Aimee Wade	Family member	Personal loss
Dr. Nicole Labor	Family member	Personal loss & addiction
Greg McNeil	Family member	Personal loss
Romona Harrison	Former receptionist for Dr. Adolph Harper from 2010 through January 2012	Pill mills
Roxann Montgomery	Former sales representative with Purdue Pharma from 2008 to 2012	Sales
Dana Sporaa	Former sales consultant with Endo Pharmaceuticals from July 2006 to June 2013	Sales
Julie Yellin	Former sales consultant with Endo Pharmaceuticals from March 2006 to June 2013	Sales
Lisa McDougall	Former sales representative for Endo Pharmaceuticals from 2004 to 2010	Sales
Carol Panara	Former sales representative for Purdue Pharma from 2008 to January 2013	Sales
Kirk Klaazesz	Former sales supervisor for ParMed Pharmaceuticals from 2011 to 2014	Sales
Gregory Bowman	Former sales specialist for Covidien and Mallinckrodt from 2010 to 2014	Sales
Richard Bradley Pate	Former pharmacy manager for Walgreens from 2009 to 2014	Diversion
David Schatz	Former sales representative for Purdue Pharma from 2000 to 2001	Sales
William Harris	Former sales representative for Cephalon and Teva from November 2005 to 2012	Sales
Marcia Smith-Anderson	Former pharmacy manager for Walgreens from 2000 to 2012	Diversion
Larry Hunley	Former distribution center manager for McKesson Corporation from 2004 to September 2011	Diversion

Name	Title	General description
Ashley Bhalla	Former sales representative for Purdue Pharma from 2012 to 2018	Sales
Daniel Smith	Former contract sales representative for Mallinckrodt from 2014 to 2015	Sales
Betty Singleton	Former pharmacist with Rite Aid Corporation from January 2010 to October 2017	Industry conduct
Karen Chapman	Former inventory manager for McKesson Corporation from October 1983 to October 2014	Industry conduct
Gertrude Kass	Former sales representative for Purdue Pharma from January 2013 to May 2015	Sales
Russell Portenoy	Executive Director of the MJHS Institute for Innovation in Palliative Care and Chief Medical Officer of MJHS Hospice and Palliative Care	Industry conduct
Alston Hammons	Former pharmacist with CVS from 2006 to 2013	Industry conduct
Martha Davis	Former district manager for Purdue Pharma from 1991 to 2003	Industry conduct
Julie Fuller	Former account manager with AmerisourceBergen Corporation from December 2003 to January 2007	Industry conduct
James Shriner	Former regional sales director for Mallinckrodt from 2002 to 2008	Sales

Plaintiff also identifies all witnesses identified or deposed in this litigation as listed on **Exhibit 12A**. This list is not intended to be an exhaustive description of all persons with knowledge or all knowledge held by a particular individual or type of individual regarding issues involved in the case. By indicating the general subject matter(s) of discoverable information these individuals may possess, Plaintiff is in no way limiting its right to call other individuals (or entities) to testify concerning other subjects.

Plaintiff specifically reserves the right to rely on these and any other individuals for testimony in any trial or in a summary judgement motion in this action, and is not limited to the individuals listed herein. Plaintiff reserves its right to amend or supplement this response based on facts learned in expert discovery, third party discovery, or otherwise discoverable in this litigation prior to trial.

Dated: May 14, 2019

Respectfully submitted,

By: /s/ Linda Singer
Linda Singer
Joseph F. Rice
Jodi Westbrook Flowers
Anne McGinness Kearse
David I. Ackerman
Jeffrey C. Nelson
MOTLEY RICE LLC
401 9th Street NW, Suite 1001
Washington, DC 20004
Tel: (202) 232-5504

CERTIFICATE OF SERVICE

I, Richard Cashon certify that on May 14, 2019, I caused the foregoing to be served via electronic mail on Defendant's Liaison Counsel pursuant to the Case Management Order in this case (ECF #232).

/s/ Richard Cashon